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June 13, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: MM Docket No. 87-268

Dear Mr. Caton

Submitted herewith are an original and four copies of a Petition for Reconsideration relating to the DTV Table of Allotments adopted in the Commission's Sixth Report and Order in the above-captioned proceeding.

Very truly yours



Richard A. Helmick

Enclosures



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BEFORE THE

Federal Communications Commission

In the Matter of)
)
Advanced Television Systems and) MM Docket No. 87-268
Their Impact Upon The Existing)
Television Broadcast Service)
)
To: The Commission)

PETITION FOR RECONSIDERATION

GOCOM License, L.L.C., licensee of Television Broadcast Station WFXI, Morehead City, North Carolina, and permittee of Television Broadcast Station WFXZ-TV, Jacksonville, North Carolina, GOCOM-Macon License, L.L.C., licensee of Television Broadcast Station WGXA, Macon, Georgia, and GOCOM-Ouachita License, L.L.C., licensee of Television Broadcast Station KTVE, El Dorado, Arkansas (collectively "GOCOM"), by its attorneys and pursuant to Section 1.429 of the Commission's Rules, hereby requests reconsideration of the Commission's Sixth Report and Order, FCC 97-115, released April 21, 1997, in this proceeding; alternatively, GOCOM requests that the time for interested parties to seek reconsideration of the DTV Table of Allotments adopted in the Sixth Report and Order be postponed until 60 days after the Commission publishes OET Bulletin No. 69, in order that meaningful reconsideration of the DTV allotments can be had. In support thereof, GOCOM states as follows.

1. In addition to the above-referenced television stations, there are pending before the Commission an application (File No. BALCT-060523IB) for GOCOM License, L.L.C. to acquire Television Broadcast Station WYDO, Greenville, North Carolina, as well as applications to transfer control of Station WFXI, WFXZ-TV, WGXA (File Nos. BTCCT-970213IC-F) to GOCOM Communications, L.L.C., a newly formed entity controlled by affiliates of Bain Capital, Inc. in which a GOCOM affiliate will have a minority interest. Moreover, Bain GOCOM is currently engaged in negotiations to acquire additional television broadcast stations. Accordingly, GOCOM and its affiliates will be directly impacted by the Sixth Report and Order's DTV Table of Allotments.


2. GOCOM's consulting engineer has advised it that critical independent assessment cannot be made of the NTSC coverage of its current and proposed station acquisitions insofar as such coverage will be impacted by the DTV channel allotments adopted by the Commission's Sixth Report and Order nor can critical assessment be made of the DTV allotments made to GOCOM's stations due to the fact that the Commission has yet to publish, or circulate even in draft form, OET Bulletin No. 69 which will set forth the basis for the DTV interference standards used by the Commission in adopting its DTV Table of Allotments.

3. Accordingly, as GOCOM is unable to make meaningful assessment of (a) whether the DTV channels allocated to its existing and proposed stations are the most desirable channels for proposed DTV operation, (b) whether other DTV channels may be available which would better serve the public interest without adversely affecting other DTV channel allotments, (c) the feasibility for an increase in power for those channels currently assigned to GOCOM's stations under the DTV Table of Allotments, etc. Under such circumstances, GOCOM, in order to preserve its substantive

and procedural rights, has no other recourse but to seek reconsideration pending Commission release of OET Bulletin No. 69.

Respectfully submitted

GOCOM LICENSE, L.L.C.,
GOCOM MACON LICENSE, L.L.C., AND
GOCOM-OUACHITA LICENSE, L.L.C.

By: 

Joel H. Levy
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June 13, 1997